

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KONINKLIJKE PHILIPS N.V. and
PHILIPS LIGHTING NORTH AMERICA
CORPORATION,

Plaintiffs,

v.

WANGS ALLIANCE CORPORATION d/b/a
WAC LIGHTING CO.,

Defendant.

CIVIL ACTION NO. 14-cv-12298-DJC

**PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT OF NO INVALIDITY**

Plaintiffs Koninklijke Philips N.V. and Philips Lighting North America Corporation (collectively, "Philips Lighting") hereby move this Court for an order granting partial summary judgment of no invalidity under 35 U.S.C. §§ 102 and 103 based on patents and printed publications for the asserted claims of U.S. Patent No. 6,250,774 ("the '774 patent"), U.S. Patent No. 6,586,890 ("the '890 patent"), U.S. Patent No. 6,561,690 ("the '690 patent"), U.S. Patent No. 7,038,399 ("the '399 patent"), and U.S. Patent No. 7,352,138 ("the '138 patent").

Pursuant to Local Rule 7.1(a)(2), Philips Lighting certifies that counsel for Philips Lighting and Defendant Wangs Alliance Corporation d/b/a WAC Lighting Co. ("WAC") conferred by telephone on June 19, 2017, and attempted in good faith to narrow or resolve the issues. WAC opposes this motion.

The grounds in support of this motion are set forth in Philips Lighting's Memorandum in Support of Plaintiffs' Motion for Partial Summary Judgment of No Invalidity and in Plaintiffs' Statement of Undisputed Facts Pursuant to Local Rule 56.1.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Philips Lighting respectfully submits that oral argument may assist the Court in determining this motion and accordingly requests the opportunity to present this Court with oral argument regarding this motion.

Dated: June 23, 2017

Respectfully submitted,

/s/ C. Brandon Rash

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as nonregistered participants on June 23, 2017.

/s/ C .Brandon Rash

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